

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Criminal No. 11-10212-JLT</b>
	)	
<b>1. JOHN WILLIS</b>	)	
<b>a/k/a "Bac Guai John"</b>	)	
<b>2. BRANT WELTY</b>	)	
<b>3. PETER MELENDEZ</b>	)	
<b>a/k/a "Shrek"</b>	)	
<b>4. AIBUN ENG</b>	)	
<b>5. BRIAN BOWES</b>	)	
<b>6. KEVIN BARANOWSKI</b>	)	
<b>7. MICHAEL CLEMENTE</b>	)	
<b>a/k/a "Ricky Martin"</b>	)	
<b>8. MICHAEL SHAW</b>	)	
<b>9. MARK THOMPSON</b>	)	
<b>10. STEVEN LE a/k/a "Little Stevie"</b>	)	
<b>11. VINCENT ALBERICO</b>	)	
<b>12. BRIDGET WELTY</b>	)	
<b>13. ANEVAY DUFFY</b>	)	
<b>a/k/a "Homegirl"</b>	)	
	)	
<b>Defendants.</b>	)	

**JOINT STATUS REPORT**

Pursuant to Local Rule 116.5(A), the United States of America and the undersigned defendants submit this joint status report in advance of the Interim Status Conference scheduled for January 25, 2011.

**1. Additional Discovery**

The government is substantially up to date in its production of discovery. Since the last status conference, the government has made several additional productions of discovery. First, the government made a voluntary, early production of Jencks Act material. Such material consisted primarily of FBI-302's and 1023's, which are reports of contacts with confidential

human sources. The government has not identified witnesses yet and did not produce all witness statements at this time.

Second, the government also disclosed pertinent consensual audio and audio/video recordings, which have previously been withheld from production pursuant to Local Rule 116.6(A). The government identified such recordings by date, location (where applicable), and known participants. As with the Title III recordings in this investigation, the government made these discs available through a third party vendor and provided copies for review by defendants in custody. The government also produced draft transcripts or draft non-verbatim summaries of the consensually recorded conversations contained on the disks to those defendants who have provided signed stipulations limiting the use of such drafts consistent with the Local Rules. The government made this production on December 22, 2011.

Finally, the government produced discovery regarding its first set of cooperating defendants in this case on January 20, 2011.

The defendants reserve the right to file for additional discovery in response to the government's productions.

## 2. Discovery Motion Schedule

The Court adopted the parties' proposed schedule for discovery litigation at the last hearing.

## 3. Expert Discovery

The Court previously deferred resolution of the expert discovery schedule to the January 25, 2012 hearing. The government has already disclosed the a summary of the expert testimony regarding the composition and amount of the drug exhibits seized in this case, which it would offer absent a stipulation regarding the drugs seized in this case. The government will produce

the laboratory backup and qualifications of its expert witnesses, and any other expert disclosures, not less than 21 days before trial.

5. Speedy Trial Act Calculations

On October 31, 2011, the Court issued an Order excluding time from the October 25, 2011, the date of the last interim status conference, through April 25, 2012, the date of the next interim status conference. Accordingly, zero days have been counted and 70 days remain under the Speedy Trial Act.

6. Anticipated Trial

The parties believe that it is still too early to determine whether a trial in this matter will be required. The United States estimates that, as the case is currently constituted, a trial would last three to four weeks.

7. Interim Status Conference

The Court previously scheduled the next interim status conference for April 25, 2011.

Respectfully submitted,

JOHN WILLIS

By: R. Bradford Bailey  
R. Bradford Bailey  
Counsel for John Willis

BRANT WELTY

By: Kevin L. Barron  
Kevin Barron  
Counsel for Brant Welty

MARK THOMPSON

By: Samuel B. Goldberg  
Samuel B. Goldberg  
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CARMEN M. ORTIZ  
UNITED STATES ATTORNEY

By: Timothy E. Moran  
Timothy E. Moran  
Richard L. Hoffman  
Assistant United States Attorney

ANEVAY DUFFY

By: Timothy Watkins  
Timothy Watkins  
Counsel for Anevay Duffy

Dated: January 23, 2012

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Timothy E. Moran  
Timothy E. Moran